

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Singular Computing LLC,

Plaintiff,

v.

Google LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE AMENDED COMPLAINT**

Defendant Google LLC (“Google”) files this Unopposed Motion for Extension of Time to Respond to the Amended Complaint seeking a 14-day extension of time for Google to answer or otherwise respond to Plaintiff’s amended complaint (Dkt. No. 37) (“the Amended Complaint”). If granted, the current April 3, 2020 deadline for Google to answer or otherwise respond to the Amended Complaint will be moved to April 17, 2020.

The Court previously granted Plaintiff’s unopposed 30-day extension of time for Google to answer or otherwise respond to Plaintiff’s original complaint. *See* Dkt. No. 15. Google filed a Motion to Dismiss under Rule 12(b)(6) on grounds that the asserted patents were not patentable under 35 U.S.C. §101 on February 28, 2020 (Dkt. No. 22). Plaintiff filed the Amended Complaint on March 20, 2020. As Google has explained to Plaintiff, Google anticipates renewing its motion to dismiss (Dkt. No. 22).

The 14-day extension requested by this unopposed motion will not cause a material delay in this action. No party will be prejudiced by the additional extension requested, and Plaintiff does not oppose this motion.

Further, because Google anticipates renewing its motion to dismiss, the parties have agreed to the following proposed briefing schedule should Google renew its motion to dismiss:

- Google's motion to dismiss the Amended Complaint to be filed on or before April 17, 2020;
- Singular's opposition to Google's motion to dismiss the Amended Complaint to be filed on or before May 15, 2020;
- Google's reply brief in support of its motion to dismiss the Amended Complaint to be filed on or before May 29, 2020. (The Court previously granted Google leave to file a reply brief in support of its prior motion to dismiss. Dkt. No. 29.)

WHEREFORE, Google respectfully requests that the Court grant Google's unopposed motion to extend Google's time to answer or otherwise respond to the Amended Complaint to April 17, 2020 and otherwise enter the agreed upon briefing schedule proposed by the parties.

DATED: March 26, 2020

Respectfully submitted,

/s/ Nathan R. Speed

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LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), I certify that, on March 24, 2020, counsel for Defendant Google LLC and counsel for Plaintiff Singular Computing LLC met and conferred in good faith regarding resolution of this motion. Counsel for Plaintiff stated that Plaintiff does not oppose this motion.

/s/ Nathan R. Speed

Nathan R. Speed

CERTIFICATE OF SERVICE

I hereby certify that, on March 26, 2020, a true copy of the above document was served upon the attorney of record for each party via the Court's CM/ECF filing system.

/s/ Nathan R. Speed

Nathan R. Speed